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Attorneys for Defendants Power
Ventures, Inc. and Steve Vachani

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FACEBOOK, INC.,

Plaintiff,

-against-

POWER VENTURES, INC. d/b/a POWER.COM, a
California corporation; POWER VENTURES, INC.
a Cayman Island Corporation, STEVE VACHANI,
an individual; DOE 1, d/b/a POWER.COM, an
individual and/or business entity of unknown nature;
DOES 2 through 25, inclusive, individuals and/or
business entities of unknown nature,

Defendants.

Case No. 5:08-CV-05780 JW

**DEFENDANT POWER VENTURES,
INC.'S RESPONSE TO
FACEBOOK'S MOTION TO
COMPEL PRODUCTION OF
DOCUMENTS**

As it has repeatedly indicated during the meet and confer process, defendant Power Ventures, Inc. (“Power”) does not believe that its source code is relevant to any of the three remaining claims Facebook asserts in this litigation. Nevertheless, Power will produce its source code pursuant to Section 8 of the Stipulated Protective Order entered by this Court on February 4, 2011. Power requests that the parties promptly meet and confer to discuss the manner in which the source code shall be produced and reviewed to ensure compliance with the protective order and to ensure that there is no unauthorized disclosure of Power’s highly confidential source code.

Dated: August 17, 2011

BURSOR & FISHER, P.A.

By _____ /s/
L. Timothy Fisher

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